

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

In Re:

Case No. 13-33776-GWE

RONNIE GLADNEY

Debtor

Chapter 13

MOTION TO MODIFY PLAN TO PROVIDE FOR IRS CLAIM

The United States of America, a creditor acting through the Internal Revenue Service (IRS), moves pursuant to 11 U.S.C. § 1329(a) for modification of the plan confirmed in this case. The United States asserts as follows in support of this motion:

The IRS has an allowed claim in the amount of \$11,161.57.

The plan either makes no provision for the priority and secured IRS debt or the plan provides for monthly disbursement that are too low to fulfill the mandatory plan provisions for full repayment of those debts pursuant to 11 U.S.C. §§ 1322(a)(2) and 1325(b)(5)(B)(ii). The insufficiency of the monthly disbursements precludes fulfillment of mandatory provisions of the plan.

The United States is entitled to a modification that will increase monthly disbursements to the IRS to an amount that is sufficient to fulfill the mandatory provisions of the plan.

Respectfully submitted,
Edward L. Stanton III
United States Attorney

By: /s/ Barbara M. Zoccola
Barbara M. Zoccola (BPR #13020)
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing has been mailed or otherwise hand-delivered to the debtor, debtor's attorney, and the trustee.

/s/ Barbara M. Zoccola

Barbara M. Zoccola

Date: December 1, 2015